

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CSX Transportation, Inc.

Plaintiff,

v.

B&G Futures, Inc.

Defendant.

CASE NO: 5:20cv2560

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to L.R. 83.5(h) of the United States Courts for the Northern District of Ohio, the undersigned, counsel for CSX Transportation, Inc., hereby moves this Honorable Court for admission of Matthew John Hopkins to appear in this action *pro hac vice* and in support of this motion, the undersigned states the following:

1. Mr. Haskins is an attorney with the firm of Cohen & Merrick P.C. which maintains an office located at 125 Coulter Avenue, Suite 1000, Ardmore, Pennsylvania 19003.
2. Mr. Haskins is in good standing of the Bar of the Commonwealth of Pennsylvania and New Jersey. See the Pennsylvania Certificate of Good Standing attached hereto as Exhibits A and the Affidavit of Matthew J. Haskins affirming his good standing in the State of New Jersey, attached hereto as B.
3. There are no pending disciplinary proceedings against him in any state or federal court.
4. Mr. Haskins has never been censured, suspended, disbarred or denied admission or readmission by any court.

5. There have been no disciplinary proceedings instituted against Mr. Haskins or any suspension of any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings.

WHEREFORE, Plaintiff, CSX Transportation, Inc., respectfully requests that this Court grant Matthew J. Haskins admission to appear in this action *pro hac vice* before this Court on its behalf.

Dated: July 20, 2021

Respectfully submitted,

/s/ Marshal M. Pitchford

Marshal M. Pitchford
DiCaudo Pitchford & Yoder
209 South Main Street, 3rd Floor
Akron, OH 44308
330-762-7477
Fax: 330-762-8059
Email: mpitchford@dpylaw.com

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**DECLARATION OF MATTHEW J. HASKINS IN SUPPORT OF
MOTION FOR ADMISSION PRO HAC VICE**

I, Matthew J. Haskins, declare under the penalty of perjury pursuant to 28 U.S.C. § 1746, the following:

1. I am submitting this Declaration in support of my motion for admission *pro hac vice*.
2. I am an attorney with the firm of Cohen & Merrick P.C., which maintains an office at 125 Coulter Avenue, Suite 1000, Ardmore, PA 19003.
3. I am an attorney duly admitted to practice in the court of the Commonwealth of Pennsylvania and the State of New Jersey.
4. I was admitted to the Bar of the Commonwealth of Pennsylvania on May 4, 2017 and was issued Attorney number 323720. Certificate of Good Standing is attached hereto as Exhibit A.
5. I was admitted to the Bar of the State of New Jersey on November 22, 2017 and was issued Attorney number 242882017. Affidavit of Matthew J. Haskins attached hereto as Exhibit B.

6. I have never been convicted of a felony.

7. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

8. There have been no disciplinary proceedings instituted against me or any suspension or any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings.

9. I designate Attorney Marshal M. Pitchford, an active Ohio attorney in good standing, as agent for service of process and the Northern District of Ohio as the forum for the resolution of any dispute arising out of my admission under Local Rule 83.5(h).

WHEREFORE, I, Matthew John Haskins, hereby respectfully request from this Court an order for admission to practice *pro hac vice* to appear as counsel for plaintiff, CSX Transportation, Inc. in the above-captioned action.

Dated: July 20, 2021

Respectfully submitted,

/s/ Matthew J. Haskins

Matthew J. Haskins

COHEN & MERRICK, P.C.

125 Coulter Avenue, Suite 1000

Ardmore, PA 19003

Tel.: (215) 609-1110

Fax: (215) 609-1117

mhaskins@freightlaw.net

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2021, I electronically filed the foregoing Motion for Admission *Pro Hac Vice* and Exhibit A with the Clerk of Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ Marshal M. Pitchford
Marshal M. Pitchford